

1 BARRY J. PORTMAN
Federal Public Defender
2 ANGELA M. HANSEN
Assistant Federal Public Defender
3 555 - 12th Street, Suite 650
Oakland, CA 94607-3627
4 Telephone: (510) 637-3500
5 Counsel for Defendant COLLINS
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,)	No. CR-08-00032 CW
)	
11 Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER CONTINUING STATUS
12 vs.)	HEARING
)	
13 ROBERT LEE COLLINS, III)	Hearing Date: April 23, 2008
)	Requested Date: May 14, 2008
14 Defendant.)	
15 _____)	

16
17 It is hereby stipulated that the STATUS hearing date of April 23, 2008 be continued to
18 May 14, 2008 at 2:00 p.m. In addition, the parties stipulate and agree that time should be
19 excluded between April 23, 2008 until May 14, 2008 because the Federal Public Defender has
20 reassigned this case to new defense counsel. New counsel was assigned this case one week ago
21 and needs time to both review the discovery and to meet with Mr. Collins. This discovery review
22 will include new discovery that was produced by the government concerning Mr. Collins' prior
23 convictions.

24 The parties agree that the ends of justice served by the continuance requested herein
25 outweigh the best interest of the public and the defendant in a speedy trial because the failure to
26 grant the continuance would deny counsel for the defendant the reasonable time necessary for

1 effective preparation, taking into account the exercise of due diligence. Time should therefore be
2 excluded pursuant to 18 U.S.C. §§ 3161(h)(8)(A) and (B)(iv).

3 April 21, 2008

4 Date

/s/

ANGELA M. HANSEN
Assistant Federal Public Defender
Counsel for defendant Collins

6 April 21, 2008

7 Date

/s/

DEREK BUTTS
Special Assistant United States Attorney

8 I hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/S/)
9 within this efiled document.

/S/ ANGELA M. HANSEN

Counsel for Defendant Collins

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12 **ORDER**

13 Based on the reasons provided in the stipulation of the parties above, the Court hereby
14 finds that the ends of justice served by the continuance requested herein outweigh the best
15 interest of the public and the defendant in a speedy trial because the failure to grant the
16 continuance would deny the counsel for the defendant the reasonable time necessary for effective
17 preparation, taking into account the exercise of due diligence. The Court makes this finding
18 because the Federal Public Defender has reassigned this case to new counsel and Mr. Collins'
19 new counsel needs time to review the discovery and to meet with the client.

20 Based on these findings, IT IS HEREBY ORDERED THAT the STATUS hearing date of
21 April 23, 2008 be continued to May 14, 2008 at 2:00 p.m. and that time be excluded from April
22 23, 2008 to May 14, 2008 pursuant to 18 U.S.C. §§3161 (h)(8)(A) and (B)(iv).

23 IT IS SO ORDERED.

24
25 Date

HON. CLAUDIA WILKEN
United States District Judge